

1 **PELUSO LAW GROUP, PC**

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6 *Attorneys for 22 Camp Fire victims*  
7 *and class action claimants*

8 **UNITED STATES BANKRUPTCY COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10  
11 In re

Bankruptcy Case No. 19:30088 (DM)

12 **PG&E Corporation,**

Chapter 11  
(Lead Case)

13 -and-

14  
15 **PACIFIC GAS AND ELECTRIC**  
16 **COMPANY**

**NOTICE OF ERRATA RE:**  
**NOTICE OF DIRECT APPEAL TO**  
**THE COURT OF APPEALS**

17 Debtors.

**[RE: NOTICE OF APPEAL FILED**  
**JULY 16, 2020 AS DKT. NO. 8442]**

18 Affects both Debtors.  
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22 PLEASE TAKE NOTICE that the Notice of Appeal filed by Larry A.  
23 Peluso of Peluso Law Group on July 16, 2020 as Dkt. No. 8442 ("Notice of Appeal  
24 and Statement of Election To Have Appeal Heard By the District Court")  
25 inadvertently contained an incorrect caption which contradicted the text of the  
26 notice by wrongly indicating election to appeal to the District Court. As the text  
27 of Docket No. 8442 indicates, Appellants are appealing directly to the Ninth  
28 Circuit Court of Appeals.

Also inadvertently, the Docket 8442 Notice identified the Appellants as all individual and class claimants represented by Peluso Law Group but failed to include the exhibit listing of appealing individual claimants and definitions of the classes. Although the identities of the Appellants are discernable by reference to the Exhibits of the Notice of Appearance filed in the Bankruptcy Court on May 30, 2020 (Dkt. 7682) and the Notice of Appearance filed in the District Court on June 5, 2020 (Dkt. 385), this filing includes the table of claimant-appellants. Thus, to clarify the intent of the Appellants, the language of the Notice of Appeal shall be replaced with the following:

**NOTICE IS HEREBY GIVEN** that Stan Rickaby, Therese Rubiolo, and other victims of the Camp Fire represented by this law firm in the above-referenced bankruptcy case (“Appellants”) hereby appeal from the *Order Confirming Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* [Bankr. Dkt. No. 8053], entered on June 20, 2020 and effective on July 1, 2020 (the “**Confirmation Order**”), which incorporates the Fire Victim Trust Agreement and exhibits, including the Fire Victim Claims Resolution Procedures, as filed with the Court on June 21, 2020 [Bankr. Dkt. No. 8057].

The Confirmation Order is a final order of the Bankruptcy Court. A copy of the Confirmation Order is attached hereto as Exhibit A. A list of Appellants is attached hereto as Exhibit B.

This appeal is directed to the Ninth Circuit Court of Appeals, as provided by 28 U.S.C. § 158(d)(2); F.R.A.P. 5; and 28 U.S.C. § 158(d)(2)(A). In a separate filing, Appellants will request the Bankruptcy Court to approve and certify this direct appeal and provide notice to the Bankruptcy Court of Appellants petition filed with the circuit clerk.

The central issue of the appeal involves a question of law to which there is no binding precedent. For this reason, review by a bankruptcy appellate panel

1 or district court would waste precious time and resources, and only delay the  
2 inevitable decision on an issue of first-impression. Thus, direct appeal  
3 materially advances the progress of the case. In addition, several questions of  
4 law to be presented, as well as mixed questions of fact and law, involve matters  
5 of great public importance.

6 Counsel for the Debtors, the Tort Claimants Committee, the pre-petition  
7 shareholders, and the Fire Victim Trustee all participated in the confirmation  
8 hearing. In an abundance of caution, the Reorganized Debtors are also listed as  
9 Appellees. Those parties and the names, addresses and telephone numbers of  
10 their respective attorneys are:

11  
12 **Reorganized Debtors**

13 WEIL, GOTSHAL & MANGES LLP Stephen Karotkin (pro hac vice) Ray C.  
14 Schrock, P.C. (pro hac vice) Jessica Liou (pro hac vice) Theodore E. Tsekerides  
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19 **Shareholder Proponents**

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21 James O. Johnston (SBN 167330) 555 South Flower Street, Fiftieth Floor Los  
22 Angeles, CA 90071.2300 Telephone: (213) 489-3939 Facsimile: (213) 243-2539 E-  
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24 **Official Committee of Unsecured Creditors**

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4 **Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and  
5 Electric Company**

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13 **Ad Hoc Group of Subrogation Claim Holders**

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21 **Fire Victim Trust**

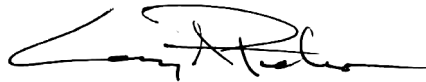
22 BROWN RUDNICK LLP Joel S. Miliband, 2211 Michelson Drive, Seventh  
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24 **Official Committee of Tort Claimants**

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12 PELUSO LAW GROUP, PC

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15 By: \_\_\_\_\_

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17 Larry A. Peluso  
18 Attorney for Camp Fire Victim Appellants  
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**EXHIBIT B**

**LIST OF APPELLANTS**

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## Individual Fire Victim Creditors

1. Rickaby Fire Support, LLC Concow, California
2. Stan Rickaby Concow, California
3. John Felder Concow, California
4. John W. Felder Family Trust Concow, California
5. Kim Stayart Concow, California
6. Therese Rubiolo Concow, California
7. John Rubiolo Concow, California
8. Katya Marrie Miller Concow, California
9. John Rowden Concow, California
10. Angela Whitehead Concow, California
11. Frank Bell Concow, California
12. Crystal Johnson Paradise, California
13. Cameron Johnson Paradise, California
14. Tim Lyons Paradise, California
15. Jesse Giles Concow, California
16. O.B, a minor Concow, California
17. Johnathan Owens Concow, California
18. Jayda Stephens Concow, California
19. Jillian Stephens Concow, California
20. Elizabeth Bartlett Concow, California
21. Laura L. Owens Paradise, California
22. Q.A.B., a minor Paradise, California

John Felder, Stan Rickaby, and Laura L. Owens, as representatives of putative Classes of Camp Fire victims; these Classes comprising (1) real property owners who have suffered diminished property value directly, proximately, and solely caused by the unique loss of community and destruction of natural environment produced by the Camp Fire, and (2) real property owners, renters, and other resident victims of the Camp Fire who suffer diminished quality of life resulting from the same causal factors.